

ALLTEL Communications, Inc.
E-911
Nineteenth Quarterly Report
May 1, 2007
CC Docket No. 94-102
WT Docket No. 05-287

Introduction

Alltel Communications, Inc. (“Alltel”) is a cellular and PCS provider subject to the Phase II deployment requirements for Tier II carriers as contained in the Commission’s Order to Stay, CC Docket No. 94-102, 17 FCC Rcd 14841 (2002) (“Stay Order”). Alltel has chosen a CDMA-based AGPS handset-based location technology to comply with the Phase II E-911 requirements for its “home” subscriber base.¹ Alltel exceeded each of the handset deployment thresholds set under the terms of the Stay Order, as has been reported to the Commission in previous quarterly reports.

Alltel is also required to begin delivering Phase II enhanced service to PSAPs by the later of six months of a bona fide PSAP request or March 1, 2003. Alltel is implementing Phase I and Phase II service to PSAPs in accord with the activation timetables negotiated with the PSAPs and has an exemplary record both for the timeliness and quality of its Phase I and Phase II activations.

This report is submitted pursuant to ¶¶ 28-31 of the Stay Order, and in accordance with the procedures established by Public Notice, Wireless Telecommunications Bureau Standardizes Reporting on Wireless E-911 Implementation, DA 03-1902 (released June 6, 2003). The spreadsheet required under the Public Notice is attached hereto. This report is also submitted to meet the requirements of paragraphs 25 and 30 of the Commission’s Order of January 5, 2007. *See In the Matter of Alltel Corporation Petition for Limited Waiver of Location-Capable Handset Penetration Rule*, WT Docket No. 05-287, FCC 06-64 (Released January 5, 2007) (the “Waiver Order”).

Alltel has continued to actively engage the PSAPs within its market areas to ensure timely deployment of both Phase I and Phase II E-911 service in keeping with the status and readiness of the particular PSAP, the availability of vendor equipment and LEC upgrades, as well as the Commission’s deadlines for Phase II E-911 under the Stay Order.

¹ Alltel has recently acquired two licensees that operated network-based solutions to establish E-911 Phase II compliance for their existing GSM or TDMA networks. Alltel intends to continue to operate these network-based solutions, pending conversion at a future date to a CDMA network, at which point an A-GPS handset solution will be implemented.

Discussion

I. Phase II AGPS Network Deployments

As previously reported, Alltel has completed switch upgrades, deployment and testing of redundant MPC/PDEs, and has implemented redundant trunking between these units. Alltel has configured its system consistent with the standard E-2 interface and has completed testing. As previously advised, further real-world testing of the MPC/PDE is necessary on a PSAP-by-PSAP basis to ensure end-to-end functionality. Alltel engages in such testing with capable PSAPs prior to cutting to live service. Alltel previously reported that it had acquired a number of GSM/TDMA-based systems and deployed CDMA overlays in these markets in accordance with timetables established with Commission staff to facilitate Phase II compliance via Alltel's existing Phase II AGPS handset-based technology solution. Alltel has converted each of these markets to CDMA technology and has incorporated them into Alltel's company-wide A-GPS based handset solution. Alltel met each of the commitments made in its waiver and is on target for a timely deployment of Phase II in those markets where pending requests have been received.

II. Handset Deployment

Alltel began deploying and activating its first ALI capable handsets in its markets on June 30, 2002 well in advance of the required March 1, 2003 date. It exceeded the May 31, 2003 handset deployment threshold (25% of new activations) with AGPS equipped handsets comprising approximately 30.3% of new handset activations as of that date. It also exceeded the November 30, 2003 threshold (50% of new activations) with AGPS equipped handsets comprising approximately 98% of new handset activations as of that date. Alltel has substantially complied with the May 31, 2004 threshold requirement that 100% of all new digital handset activations must be ALI-capable. Alltel has continued its internal monitoring of handset activations on a granular ESN by ESN basis with the assistance of its vendors to ensure that all location capable handsets are tracked accurately throughout Alltel's distribution system.

Given the now documented pace of customer migration to ALI-capable handsets and forecasted churn, Alltel concluded that it would not meet the Commission's 95% AGPS handset penetration requirement by December 31, 2005. The Company filed a limited waiver request for the merged Alltel/Western Wireless company with the Commission on September 30, 2005 that included a detailed explanation of its good faith compliance efforts, extensive documentation on the slow down in existing customers' migration to A-GPS handsets, as well as the Company's expected "path to full compliance" and those showings have been supplemented.² The Commission denied the waiver request in the Waiver Order, and the matter has been referred to the Enforcement Bureau for further consideration.

² See Alltel Corporation Petition for Limited Waiver, filed Sept. 30, 2005 in CC Docket No. 94-102 (the "Petition"); Public Notice, *Wireless Telecommunications Bureau Requests Comment on Alltel Petition for Limited Waiver of the December 31, 2005 Deadline to Achieve Ninety-Five Percent Penetration of Location-Capable Handsets*

ALI capable handset deployment levels for Alltel's current subscriber base stands at 94.5% as of March 31, 2007. Alltel is continuously monitoring its number of activated ALI-capable handsets and will continue its ongoing efforts directed toward augmenting ALI capable handset penetration, including consideration of the attributes of those subscribers with non-ALI capable handsets.

The following is a summary list of AGPS-enabled handsets currently distributed by Alltel and their launch dates:

BlackBerry 7130e	Mar-06
BlackBerry 8703e	Nov-06
Kyocera KX12	Mar-06
Kyocera KX16 Candid	Dec-05
Kyocera K612B Strobe	Jun-06
LG AX245	Nov-06
LG AX275	Apr-07
LG AX390	Jul-06
LG AX355	Jul-06
LG AX490	Aug-06
LG AX8600	Mar-07
Motorola E815	May-06
Motorola M800	Mar-06
MOTORAZR V3c	Nov-05
MOTORAZR V3m	Dec-06
MOTOKRZR K1m	Oct-06
Motorola W315	Sep-06
Motorola Q	Mar-07
Nokia 2865i	Sep-06
Palm Treo 700WX	Dec-06
Palm Treo 700P	Jan-07
Pantech PN218	Aug-06
Samsung A645	Aug-06
Samsung U420	Sep-06
Samsung U520	Dec-06

III. Accuracy Requirements and Methodology

Alltel's extensive testing and evaluation processes were reported and detailed in its earlier Quarterly Reports. Alltel has transitioned from testing and evaluating its AGPS solution, which Alltel believes is compliant with the Commission's rules and consistent with OET Bulletin 71, to real-world deployment of its technology in response to valid PSAP requests. Alltel has contracted with WFI and Marconi (recently purchased by Ericsson) for calibration and functional testing for deployment to capable PSAPs. Alltel has separately contracted with TechnoCom to engage in accuracy testing in accordance with OET Bulletin 71. In all markets in which PSAPs have requested service,

Among Its Subscribers, WT Docket No. 05-287, DA 05-2675 (rel. Oct. 7, 2005). *See also*, Letter of Richard N. Massey, Executive Vice President and General Counsel of Alltel Corporation to Marlene H. Dortch, Secretary, Federal Communications Commission in CC Docket No. 94-102, dated October 12, 2006.

Alltel is capable of transmitting Phase II-compliant ALI to the PSAP for all of its MSC vendors – Lucent, Nortel and Motorola. As discussed below, additional testing is required as individual PSAPs complete their own upgrades and deployment proceeds on a PSAP by PSAP basis. Finally, Alltel continues to test new ALI-capable handsets prior to their acceptance into its product line to establish benchmarks for Phase II location accuracy.

IV. Deployment Issues

As previously reported, Alltel has encountered the same PSAP, vendor and LEC issues as well as the technology hurdles normally experienced with the initial deployment of a maturing technology. These issues have arisen in both the Phase I and Phase II contexts. Alltel's experience indicates that, in most markets, problems are resolved in a timely manner and subject to mutually agreed upon deployment schedules for Phase II so that service to the PSAPs is not adversely affected.

Regarding those networks Alltel has acquired through acquisition, Alltel has converted, or will convert, these GSM/TDMA networks to CDMA and, consequently, Alltel's handset-based E-911 Phase II solution, to provide Phase II service in response to valid PSAP requests. Where PSAPs in these markets are currently providing Phase II service, Alltel has made arrangements to continue the existing network-based solution to provide continuous E-911 Phase II services until the CDMA conversion is complete, and the GSM/TDMA platforms are discontinued. Alltel continues to work hand-in-hand with the PSAPs in these markets to ensure timely deployment according to the negotiated dates.

V. Status of Phase I and Phase II Deployment Efforts.

Alltel continues to strive for early E-911 deployment. Additional markets are moving rapidly toward live Phase II deployment. Detailed spreadsheets on both Phase I and Phase II deployment schedules are attached to this filing. Alltel would be pleased to provide the Commission with such additional information as it may require.

A. Phase I

Alltel has received 1740 Phase I PSAP requests as of April 30, 2007, of which 1468 have been implemented. Alltel has approximately 129 PSAP requests for Phase I in progress with implementation scheduled for the agreed upon deployment date listed in the attached spreadsheets. Alltel has pending 143 requests for Phase I service that have been determined to be non-bona fide requests, although Alltel continues to cooperatively work with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs readiness.

B. Phase II

To date, Alltel has received a total of 1379 Phase II requests. Of this number, 1067 requests have been met and service has been cut-live, while approximately 190 requests are in progress with deployment scheduled for the agreed upon dates listed on the attached spreadsheets. Alltel has received 122 non-bona fide requests, and Alltel continues to work cooperatively with these PSAPs in order to schedule activation in accordance with the prospective time frame for the PSAPs' readiness.

C. General Condition

As previously reported, technology issues for Alltel's multi-vendor network have largely been resolved and Alltel continues to work aggressively to resolve open issues on a PSAP-by-PSAP basis. Although some minor delays in Phase II service have occurred, Alltel has taken all the steps for deployment on its home subscriber serving networks that are not dependent on PSAP readiness. Alltel has completed all hardware and software upgrades necessary in its own network and completed testing; accounted for all trunking between its system to the selective router and the ALI database; and established and maintained contact with the PSAPs to obtain any necessary information. Order on Reconsideration, FCC 02-318, ¶ 21 (rel. Nov. 26, 2002), codified at 47 C.F.R. § 20.18(j)(4)(vi). As discussed above, however, full end-to-end testing requires PSAP participation. Also, as discussed in previous reports (incorporated herein by reference) further refinements are necessary during the final deployment stages, as each PSAP's network and equipment is different. Alltel continues to arrive at mutually agreed upon launch dates with its PSAPs. *See* 47 C.F.R. § 20.18(j)(5). Nevertheless, in some markets there is a chance that Alltel will encounter unforeseen delays in implementation and, consequently, may need to seek specific and limited relief from deployment deadlines. Alltel's good faith efforts warrant Commission flexibility as Alltel works through the PSAP-specific issues that will arise during final end-to-end testing with PSAPs.³

Alltel would be pleased to provide the Commission with such additional information as the Commission may require.

³ As the Commission has acknowledged, an additional period of time is required between the time the PSAP becomes E-911 capable and the date of service launch. *See* 47 C.F.R. § 20.18(j)(4)(x) (affording certifying carriers 90 days to provide E911 service after the PSAP becomes capable).

Declaration

I have read the foregoing E-911 Nineteenth Quarterly Report of Alltel Communications, Inc. and declare under penalty of perjury that it is true and correct to the best of my information and belief. Executed May 1, 2007.

/s/

Glenn S. Rabin
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CERTIFICATE OF SERVICE

I, Glenn S. Rabin, hereby certify that on the 1st day of May, 2007, I caused copies of the foregoing "Nineteenth Quarterly Report" to be sent to the following by first class mail, postage pre-paid, to the following:

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Glenn S. Rabin